

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

DON LIA, MOBILE MANAGEMENT, LLC,
and N.R. AUTOMOTIVE, INC.,

Plaintiffs
-against-

MICHAEL SAPORITO and
JESSE ARMSTEAD,

Defendants.

Case No. CV-11-3621 (SJF/ETB)

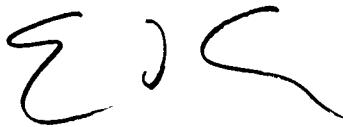
**NOTICE OF MOTION TO INTERVENE
AND FOR CONSOLIDATION**

PLEASE TAKE NOTICE that on a date to be set by the Court, the undersigned, attorneys for Movants, W&D Imports, Inc. d/b/a Willis Honda and David Davis, hereby move this Court to intervene pursuant to Federal Rule of Civil Procedure 24 and to consolidate with *W&D Imports, Inc. d/b/a Willis Honda v. Lia, et al.*, Case No. CV-11-4144 (E.D.N.Y. Aug. 25, 2011) pursuant to Federal Rule of Civil Procedure 42.

PLEASE TAKE FURTHER NOTICE that Movants will rely upon the brief and affidavit of counsel submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is enclosed with this filing.

DATED: September 21, 2011
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